

CORENE KENDRICK (SBN 226642)  
ckendrick@aclu.org  
KYLE VIRGIEN (SBN 278747)  
kvirgien@aclu.org  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
39 Drumm St.  
San Francisco, CA 94111  
(202) 393-4930

MARIA V. MORRIS (SBN 223903)  
mmorris@aclu.org  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
915 Fifteenth Street NW, 7th Floor  
Washington, DC 20005  
Telephone: (202) 548-6607

EMI MACLEAN (SBN 319071)  
EMacLean@aclunc.org  
ACLU OF NORTHERN CALIFORNIA  
39 Drumm Street  
San Francisco, California 94111  
Telephone: (415) 621-2493

Attorneys for Plaintiff

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
MICHELLE LO (NYRN 4325163)  
Chief, Civil Division  
J. WESLEY SAMPLES (CABN 321845)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7073  
FAX: (415) 436-6748  
wes.samples@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
JUSTICE,

Defendant.

) CASE NO. 3:23-CV-05248-JD

) **JOINT STIPULATION TO MODIFY**  
) **DEADLINES FOR THE JOINT CASE**  
) **MANAGEMENT STATEMENT, CASE**  
) **MANAGEMENT CONFERENCE, AND**  
) **[PROPOSED] ORDER**

) Current CMC Date: January 11, 2024

) Time: 10:00 a.m.

) San Francisco Courtroom 11, 19<sup>th</sup> Floor

) The Honorable James Donato

WHEREAS, the deadline to meet and confer regarding initial disclosures, early settlement, ADR process selection, and the discovery plan and to file the ADR Certification is set for December 21, 2023, a Joint Case Management Statement is due January 4, 2024, and an Initial Case Management Conference is set for January 11, 2024. *See* Dkt. No. 6.

WHEREAS, in a separate filing pursuant to Civil Local Rule 6-1(a) Plaintiff the American Civil Liberties Union Foundation and Defendant the United States Department of Justice have stipulated that the deadline for the Defendant the United States Department of Justice to answer or otherwise respond to the Complaint is February 15, 2024.

NOW, WHEREFORE, the Parties jointly and respectfully submit stipulation.

Pursuant to Civil Local Rules 6-1(b), 6-2(a) and 7-12, and subject to the Court's approval, the Plaintiff the American Civil Liberties Union Foundation and Defendant the United States Department of Justice (collectively, the "Parties") agree and hereby jointly stipulate to continue the initial case management deadlines as follows:

<b>PROPOSED INITIAL CASE MANAGEMENT DEADLINES</b>			
<b>Stipulated Date</b>	<b>Date Set In Dkt. No. 6</b>	<b>Event</b>	<b>Governing Rule</b>
Thursday, February 22, 2024	Thursday, December 21, 2023	*Last day to: • meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan	FRCivP 26(f) & ADR L.R.3-5
		• file ADR Certification signed by Parties and Counsel (form available at <a href="http://www.cand.uscourts.gov">http://www.cand.uscourts.gov</a> )	Civil L.R. 16-8(b) & ADR L.R. 3-5(b)
Thursday, February 29, 2024	Thursday, January 4, 2024	**Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement (also available at <a href="http://www.cand.uscourts.gov">http://www.cand.uscourts.gov</a> )	FRCivP 26(a)(1) Civil L.R. 16-9
Thursday, March 7, 2024	Thursday, January 11, 2024	INITIAL CASE MANAGEMENT CONFERENCE (CMC) at 10:00 AM in: Courtroom 11, 19th Floor Phillip Burton Federal Building 450 Golden Gate Avenue San Francisco, CA 94102	Civil L.R. 16-10
* If the Initial Case Management Conference is continued, unless otherwise ordered this deadline is			

JOINT STIPULATION

CASE NO.: 3:23-CV-05248-JD

continued to 21 days in advance of the Initial Case Management Conference.

**\*\* If the Initial Case Management Conference is continued, unless otherwise ordered this deadline is continued to 7 days in advance of the Initial Case Management Conference.**

These requests are made in view of the availability of counsel during the holidays, and so that Plaintiff and Defendant may have an opportunity to meet and confer regarding the underlying FOIA request to possibly narrow the issues in this case before any other filings are made.

This is the first request by the Parties to modify the schedule in this case. The requested modifications will not impact the schedule other than as to the Joint Case Management Statement, and date for the Initial Case Management Statement, and the deadlines that depend thereon.

Respectfully submitted,

ISMAIL J. RAMSEY  
United States Attorney

DATED: December 18, 2023

/s/ J. Wesley Samples  
J. WESLEY SAMPLES  
Assistant United States Attorney  
Attorney for Defendant

DATED: December 18, 2023

/s/ Maria V. Morris\*  
MARIA V. MORRIS,  
ACLU National Prison Project  
Attorney for Plaintiff

*\* In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.*

**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.** The initial case management schedule is as follows:

<b>CASE SCHEDULE</b>		
<b>Date</b>	<b>Event</b>	<b>Governing Rule</b>
Thursday, February 22, 2024	*Last day to: • meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan	FRCivP 26(f) & ADR L.R.3-5
	• file ADR Certification signed by Parties and Counsel (form available at <a href="http://www.cand.uscourts.gov">http://www.cand.uscourts.gov</a> )	Civil L.R. 16-8(b) & ADR L.R. 3-5(b)
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* If the Initial Case Management Conference is continued, unless otherwise ordered this deadline is continued to 21 days in advance of the Initial Case Management Conference.		
** If the Initial Case Management Conference is continued, unless otherwise ordered this deadline is continued to 7 days in advance of the Initial Case Management Conference.		

**IT IS SO ORDERED.**

DATED:

\_\_\_\_\_  
THE HONORABLE JAMES DONATO  
United States District Judge